

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VOLTERRA SEMICONDUCTOR
LLC,

Plaintiff,

V.

MONOLITHIC POWER SYSTEMS,
INC.,

Defendant.

Redacted - Public Version

C.A. No. 19-2240-CFC-SRF

**NO. #1: DEFENDANT’S RESPONSE TO PLAINTIFF’S
CONCISE STATEMENT OF FACTS CONCERNING DEFENDANT’S
MOTION FOR SUMMARY JUDGMENT OF NO INDIRECT
INFRINGEMENT BASED ON**

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Dated: January 7, 2022

Monolithic Power Systems, Inc. (“MPS” or “Defendant”) responds to Volterra’s additional “Responsive Statement of Facts” (D.I. 302 ¶¶ 7-13), as set forth below. This response is supported by MPS’s concurrently filed Reply Brief in Support of Defendant’s Motion for Summary Judgment of No Indirect Infringement Based On [REDACTED] (“Reply”), which further sets forth MPS’s explanations and bases for responding to these “facts.”

7. Admitted, but immaterial. [REDACTED]

[REDACTED] See Reply at 6-7.

8. Admitted, but immaterial. [REDACTED]

[REDACTED] See Reply at 6-7.

9. Admitted, but immaterial. [REDACTED]

[REDACTED] See Reply at 5-6.

10. Admitted,¹ but immaterial. Mr. Bochenek's testimony regarding

[REDACTED] is immaterial.

See Reply at 3-6.

11. Disputed, but immaterial. Dr. Dickens's expert report does not "explain[]" how [REDACTED]

[REDACTED] None of the cited evidence in Paragraph 11 supports that [REDACTED]

[REDACTED] See D.I. 302, Ex. 3 (Dickens Opening Report) ¶¶ 110, 163, 206; Reply 2-3. Additionally, nothing in Paragraph 11 supports that any of these alleged acts [REDACTED] occur *within the United States*, a requirement for infringement. *Id.*

12. Disputed, but immaterial. Dr. Dickens's expert report does not opine on how MPS induced [REDACTED] to "make and import into the United States the Nvidia Power Solution." None of the cited evidence in Paragraph 12 supports that [REDACTED] the NVIDIA Power Solution at all. See D.I. 302, Ex. 3 ¶¶ 73-74; Reply 2-3. Additionally, nothing in Paragraph 12 supports that

¹ While MPS admits that Mr. Bochenek made the quoted statements in his deposition testimony, Volterra does not include Mr. Bochenek's full response in Paragraph 10. For completeness, Volterra omitted Mr. Bochenek's response that he did not [REDACTED]

[REDACTED] D.I. 302, Ex. 2 at 221:8-18.

any these acts [REDACTED] occur *within the United States*, a requirement for infringement. *Id.*

13. Disputed, but immaterial. As in Paragraph 12 above, Dr. Dickens's expert report does not opine on how MPS induced [REDACTED] "to make and import" the coupled inductors included in the NVIDIA Power Solution. None of the cited evidence in Paragraph 13 supports that [REDACTED] the coupled inductors included in the NVIDIA Power Solution at all. *See* D.I. 302, Ex. 3 ¶¶ 65, 486; Reply 2-3. Additionally, nothing in Paragraph 13 supports that any these acts [REDACTED] occur *within the United States*, a requirement for infringement. *Id.*

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CERTIFICATE OF COMPLIANCE

Pursuant to the Court's November 6, 2019 Standing Order, I hereby confirm that this brief complies with the type and number limitations set forth in the Standing Order. I certify that this document contains 527 words, which were counted using the word count feature in Microsoft Word, in 14-point Times New Roman font. The word count does not include the cover page, tables, or the counsel blocks.

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CERTIFICATE OF SERVICE

I, Nathan R. Hoeschen, hereby certify that on January 7, 2022, this document was served on the persons listed below in the manner indicated:

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